

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA, ET. AL, JEFFREY M. SIMONEAUX, Relator	* * * * * * *	CIVIL ACTION NO. 3:12-cv-219 JUDGE SHELLY D. DICK MAGISTRATE JUDGE RIEDLINGER
VERSUS	*	
E.I. du PONT de NEMOURS AND COMPANY	* *	

NOTICE OF DEPOSITION

TO: E. I. du Pont de Nemours and Company,
through counsel of record,
Monique M. Weiner
1615 Poydras Street, Suite 1300
New Orleans, LA 70112

PLEASE TAKE NOTICE that on the 17th day of December, 2013, Plaintiff, Jeffrey M. Simoneaux, will take the deposition of Gene Clemmons in his personal capacity and as the corporate representative of E.I. du Pont de Nemours and Company ("DuPont"), pursuant to Rule 30(b)(6), at the office of Kuchler, Polk, Schell, Weiner & Richeson, LLC, 1615 Poydras St., Ste. 1300, New Orleans, LA 70112, before a Court Reporter duly authorized to administer oaths and record oral testimony. The deposition of Gene Clemmons is to be taken beginning at 10:00 o'clock a.m. This deposition is taken for all purposes, including discovery and use at trial.

Examination of Gene Clemmons in his personal capacity and as the corporate representative for DuPont is requested on the following matters, including, but not limited to:

1. The decision to use and use of the hose/vacuum/metal box apparatuses in connection with the HIP, the CIP, the Converter, the Superheater and any related ductwork and plenums;

EXHIBIT #

DEPONENT



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2. The decisions and plans with respect to work to be done during the shutdown in an effort to resolve the leaks in that equipment.

The deposition will continue from day to day thereafter until completed. You are invited to attend and participate as you deem appropriate.

RESPECTFULLY SUBMITTED BY:

/s/ Jane H. Barney
Jane H. Barney (Bar Roll: 22246)
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And

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served electronically upon the counsel of record for E.I. du Pont de Nemours and Company, Monique M. Weiner, 1615 Poydras Street, Suite 1300, New Orleans, LA 70112, Email: mweiner@kuchlerpolk.com.

Baton Rouge, Louisiana, this 12th day of December, 2013.

/s/ Jane H. Barney
Jane H. Barney

cc: Torres Court Reporters (225) 751-0732
tra@torresreporting.com